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ATTORNEYS FOR DEBTOR

IN RE:

ROBERT MIRASOLA,
Debtor

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

CHAPTER 13

CASE NO. 18-31095-MBK

**CERTIFICATION OF DEBTOR OPPOSING
CHAPTER 13 TRUSTEES' CERTIFICATION
OF DEFAULT**

The Debtor, of full age, hereby certifies as follows:

1. I am filing this motion in opposition to the Trustee's September 12, 2023 Certification of default, seeking to dismiss my case for being in arrears with Trustee payments in the amount of \$2,022.00 (Doc 58).

2. My Plan (Doc 13) is for 60 months and was confirmed by the Court on January 22, 2019 (Doc 23). I have recently been overwhelmed with various health problems, including serious complications from Chron's Disease, which have caused me some financial difficulties.

3. However, I have recently made two (2) separate Trustee payments in the amount of \$1,015.00 (on 9/21/23) and \$1,000.00 (on 9/22/23), essentially entirely eliminating the arrears.

4. Before making the payments listed above, the total balance due on my Plan was in the amount of \$3,620.00, as

advised by the Trustee. After the payments, the total Plan balance is now \$1,605.00, which means my Plan is due to be paid in full in November of this year (i.e., within the next 60 days).

5. Despite the various difficulties encountered, I am almost to the proverbial "finish line" and "promised land". I respectfully request that my case not be dismissed and that I be permitted to complete my Plan, as scheduled, within the next 60 days. I have worked too hard and come too far to lose the game in its final minutes.

6. I desire the opportunity to complete my Chapter 13 Plan as I am literally in the bottom of the "ninth inning" of the game, if the Court will permit the baseball analogy. Without the Trustee and Court's indulgence, the last almost five (5) four years of hard work will have been completely lost, wasted and for naught.

7. I hereby certify that the statements herein are true. I am aware that if any of the foregoing statements is willfully false, I am subject to punishment.

/s/Robert Mirasola

Robert Mirasola

Dated: September 22, 2023